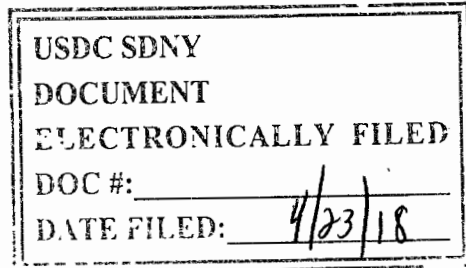


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April 20, 2018

VIA ECF

MEMO ENDORSED

Honorable Colleen McMahon
Chief United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: **United States v. Connolly, et al., No. 16-cr-00370**

Dear Chief Judge McMahon:

On behalf of Matthew Connolly and Gavin Campbell Black ("Defendants"), we submit this letter to respectfully request a page-limit increase to enable Defendants to file joint omnibus motions *in limine* rather than individual motions. Specifically, Defendants request a 30-page increase—the same increase provided to the Government—for a total of 55 pages. The Government has agreed not to oppose this request. [See ECF No. 211.]

Defendants also propose to file individual motions *in limine* addressing issues unique to each Defendant that will comply with the page limitations set forth in the Court's Individual Practices and Procedures Rule IV.E.

Thank you for your consideration.

Respectfully submitted,

Levine Lee LLP

/s/ Seth L. Levine
Seth L. Levine
Miriam L. Alinikoff

cc: All parties (via ECF)